



EPA Region 5 Records Ctr.



257456

April 10th, 2006
(Via certified or express mail)

Mr. Kevin Turner-Environmental Scientist, OSC
U. S. Environmental Protection Agency
c/o Crab Orchard National Wildlife Refuge
8588 Rt. 148
Marion, IL 62959

Mr. Thomas Martin, Esq.
Associate Regional Counsel
77 West Jackson Boulevard (C-14J)
Chicago, IL 60604-3590

**Re: Sauget Sites Area I - May 31, 2000 Unilateral Administrative Order (UAO)
Sediment / Soils Removal Action
Monthly Report; March 1 – March 31, 2006 Reporting Period**

Dear Mr. Turner and Mr. Martin,

Enclosed is the Monthly Report for the Sauget Sites Area I May 31, 2000 Unilateral Administrative Order ("UAO") Sediment Removal Action. This submittal is in fulfillment of the monthly reporting requirements of the UAO, Section V, and paragraph 3.4. Reporting and covers the period from March 1 to March 31, 2006.

Sincerely,

Steven D. Smith
Project Coordinator

cc: Nabil Fayoumi – USEPA Region 5
Sandra Bron - IEPA
Mike Coffey - USFW
Richard Williams - Solutia
Cathleen Bumb - Solutia
Mayor Frank Bergman - Cahokia
Village of Sauget – c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
L. Glen Kurowski- Monsanto
Linda Tape - Husch & Eppenberger

Sauget Sites Area I - Sauget, Illinois

May 31, 2000 UAO – Dead Creek Sediment Removal Action

Status Report

Date of Report: April 10, 2006
Period Covered: March 1, 2006 – March 31, 2006

Work Performed During the Reporting Period

Groundwater Monitoring

- *Revision 01 of the Draft Groundwater Monitoring Plan - submitted to the Agencies on August 3, 2001. Although it has not received Agency approval, it has been implemented.*

TSCA Containment Cell

- *The Operations and Maintenance Report - submitted for the Agencies' review and approval on August 28, 2001- remains under review. Portions of the Plan applicable to the placement of sediments have been approved.*
- Performed inspections of the site.
- Maintained stormwater and leachate collection controls around the containment cell.
- Monitored support area facilities.
- Obtained first quarter 2006 groundwater samples from the monitoring wells around the cell.

Dead Creek

A final revised excavation plan for Sectors B, D, and F in Dead Creek, was submitted to the Agency on October 28, 2005. This work plan was approved on November 2, 2005.

An additional Work Plan was submitted on November 15th proposing the excavation of mercury impacted soils in CS – F and the Borrow Pit Lake (BPL) . Revisions were made to the plan in response to EPA comments and the revised plan was verbally approved on December 5th. Written approval was received on December 21st.

The excavation contractor, PSC, began mobilizing to the site on November 7, 2005. By the end of the reporting period, all of the planned excavations had been completed. The analytical results for all of the confirmation samples for all of the COPCs have been received, with the exception of three verification samples from CS-F, T5 and one sample from CS-D in the vicinity of T5 that were being analyzed for dioxins. The COPC concentrations in all of the verification samples for which results were received were below the relevant RBCs. Based on post excavation surveys, a total of 12,323 cubic yards of soils were removed from the creek bottom and the BPL and placed in the containment cell.

Construction of a new temporary cover on the containment cell was also completed by the end of March. The cover is identical to the previous one and consists of a layer of geotextile covered by a scrim-reinforced polyolefin membrane.

While excavating soils in CS-F, T5, a sewage force main was damaged and began leaking. The leakage was contained between cofferdams that were constructed across the creek on either side of the main and American Bottoms was notified of the damage. The leak occurred at a broken connection and the fitting was temporarily repaired within hours of the accident. The leaked sewage was removed from between the cofferdams using a vacuum truck and was transported to the America Bottoms treatment facility for treatment and disposal. Permanent repairs were completed in March.

In response to the IEPA's concern about residual concentrations of organic constituents leaching to the groundwater at concentrations in excess of the Illinois Class I groundwater standards, it was proposed that creek bottom soils in CS-E at Transect T16 be removed because of the presence of dieldrin in these soils and that confirmation samples be taken at transect T6 in CS-D and analyzed for the same constituent. The proposal was accepted by the Agency and the additional sample in CS-D was obtained and analyzed. No dieldrin was detected in the sample. The additional proposed excavation in CS-E will be carried out as soon as access agreements have been finalized with property owners.

Data Submittal

No data are submitted with this report.

Work Scheduled for Next Reporting Period

- Conduct routine inspection of the containment cell.
- Continue operation of the stormwater treatment system.
- Perform necessary operation and maintenance activities on the containment cell and temporary treatment system.
- Complete validation of the analytical results from the fourth quarter 2005 samples from the monitoring wells around the containment cells.

- Complete laboratory analyses of the first quarter 2006 groundwater samples from these wells.
- Complete grading the creek bottom between the end of CS-E at Parks College and the upstream end of CS-C to promote drainage.
- Continue to fund the City of Cahokia's operation of the creek dewatering system.

PROJECT COMPLETION

Mobilization	100 %
Berm Construction	100 %
Liner Installation	100 %
Sediment Removal Preparation	100 %
Sediment Excavation (Site M)	100 %
Sediment Excavation (Original Scope of Work)	100 %
Sediment Excavation (Sector F)	100 %
Temporary Cover installation	100 %
Demobilization - Phase I	100 %
Final Cover Installation	0 %
Demobilization - Phase II	0 %
Final Report Preparation	0 %